

**WASTE MANAGEMENT**

10840 Alramont Pass Road
Livermore, CA 94551

March 18, 2009

Bill Brattain, Water Resources Control Engineer
California Regional Water Quality Control Board
- Central Valley Region
3443 Routier Road, Suite A
Sacramento, CA 95827-3003

**WASTE DISCHARGE REQUIREMENTS – ALTAMONT LANDFILL AND
RESOURCE RECOVERY FACILITY, LIVERMORE, CALIFORNIA**

Dear Mr. Brattain:

Waste Management (WM) appreciates the opportunity to provide these comments to the tentative Waste Discharge Requirements (WDRs) and Monitoring and Reporting Program (MRP) for the above-referenced site issued by the California Regional Water Quality Control Board – Central Valley Region (RWQCB) on February 17, 2009. Our proposed modifications to the tentative WDRs and MRP are summarized below.

WDR**Page 2, Finding 5, Table:**

Disposal Area	Lined or Unlined	Start of Operations	Permitted Waste	Unit Classification	Approximate Permitted Acreage / Capacity
Fill Area 1, Unit 1	Unlined	1980	Nonhazardous solid waste, asbestos	Class III	122
Fill Area 1, Unit 2	Lined	1994	Designated and non-hazardous solid waste, asbestos	Class II	433 113

Comment: *Correction*

From everyday collection to environmental protection, Think Green® Think Waste Management.

Page 3, Finding 8, First Sentence:

“The facility is the largest landfill in the Bay Area and accepted approximately 1.79 million tons of material in 2007~~8~~, which includes refuse and cover.”

Comment: *Updated acceptance data.*

Page 4, Finding 11, Last Sentence:

“Prior to such acceptance of other liquid designated waste, this Order requires the Discharger to submit a JTD amendment that identifies and characterizes the waste, includes any additional measures necessary such as odor and/or vector control, and includes a water balance that demonstrates the impoundments have adequate capacity to accept the waste.”

Comment: *Clarification that sentence applies to other liquid designated waste.*

Page 5, Finding 18, Last Sentence:

“CCR title 22 defines “Treated wood” to mean wood that has been treated with a chemical preservative for purposes of protecting the wood against attacks from insects, microorganisms, fungi, and other environmental conditions that can lead to decay of the wood and the chemical preservative is registered pursuant to the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. Sec. 136 and following).”

Comment: *Correction on punctuation.*

Page 7, Finding 23, First Sentence:

“The Discharger proposes to discharge landfill leachate into two Class II surface impoundments and treat it for and use as dust control in lined Class II landfill areas or return it to the lined unit in accordance with CCR Title 27.”

Comment: Clarification

Page 15, Finding 60, Last Sentence:

“~~The Discharger must install new groundwater monitoring well(s) at the downgradient edge of the waste to evaluate continued compliance with the water quality protection standards.” [remove]~~

Comment: *As described in finding 73, two wells currently exist in this area (E-05 and E-07).*

Page 17, Finding 74, Last Sentence:

“These WDRs adopt the corrective action measures for this area as described in the 2005 Revised Engineering Feasibility Study. To facilitate the groundwater cleanup strategy outlined in Title 27, monitoring well E-20B is now identified as a corrective action well.”

Comment: *Additional sentence for consistency with finding 74.*

Page 17, Finding 75, First Sentence:

“The following VOCs have been detected routinely in groundwater: dichlorofluoromethane, ~~trichlorofluoromethane~~ trichlorofluoromethane, dichlorodifluoromethane, diethyl ether, tetrahydrofuran, and vinyl chloride.”

Comment: *Spelling correction*

Page 22, Finding 100, First Sentence:

“The AFC Report also presented information from the ~~exhumation~~ examination of the existing final covers that were installed in 1989 and 1992.”

Comment: *Suggested clarification.*

Page 23, Finding 104, Last Sentence:

“This Order includes ~~requirements~~ provisions for returning leachate and landfill gas condensate back to the units such with the condition that it is not exposed to surface water runoff, will not cause instability of the landfill, and will not seep from the edges of the units.”

Comment: *Suggested Clarification.*

Page 24, Finding 106, Second Sentence:

“The total amount of the closure cost estimate is \$23.9 million for Fill Area 1 and Stage 1 of Fill Area 2, Unit 1, and the cost estimate for post-closure maintenance in this same area \$36.7 million.”

Comment: *Correction.*

Page 30, Finding C.3., Last Sentence:

“Liquid from the Class II surface impoundments shall only be used for dust control ~~shall be treated, and used only in lined Class II landfill areas.~~”

Comment: *Suggested clarification.*

Page 34, Finding D.12., First Sentence:

“Following the completion of construction of any Unit (~~including~~ including the Class II surface impoundments) or portion of a Unit, the Discharger shall conduct a leak detection test on the bottom geomembrane layer of the floor or base containment system (excludes side-slope areas).”

Comment: *Spelling correction.*

Page 36, Finding E.1., First Sentence:

“The Discharger shall submit for review and approval a groundwater detection monitoring program demonstrating compliance with Title 27 for any ~~Unit~~ landfill expansion.”

Comment: *Suggested clarification.*

Page 37, Finding E.9., Third Sentence:

“Sample collection, storage, and analysis shall be performed according to the most recent and appropriate version of USEPA Methods, such as the latest editions, as applicable, of: (1) Methods for the Analysis of Organics in Water and Wastewater (USEPA 600 Series), (2) Test Methods for Evaluating Solid Waste (SW-846, latest edition), and (3) Methods for Chemical Analysis of Water and Wastes (USEPA 600/4-79020), and in accordance with the approved Sample Collection and Analysis Plan.

Comment: *Suggested clarification.*

Page 37, Finding E.9., Third Sentence:

“Sample collection, storage, and analysis shall be performed according to the most recent and appropriate version of USEPA Methods, such as the latest editions, as applicable, of: (1) Methods for the Analysis of Organics in Water and Wastewater (USEPA 600 Series), (2) Test Methods for Evaluating Solid Waste (SW-846, latest edition), and (3) Methods for Chemical Analysis of Water and Wastes (USEPA 600/4-79020), and in accordance with the approved Sample Collection and Analysis Plan.

Comment: *Suggested clarification.*

Page 45, Finding G.23:

To be consistent with Finding #66, it is recommended that reference to “Class II surface impoundments” be removed from G.23(a), and that a new section be added as follows:

G.23.b. Discharger shall propose a monitoring program for the Class II surface impoundments, and an approved plan(s) must be in place prior to discharge to such impoundments.

Comment: *Suggested modification will allow discharger to evaluate the use of both existing monitoring devices, as well as engineered design features for early detection.*

MRP

Page 4, Second Paragraph:

For non-anthropogenic COCs monitoring parameters (e.g., trace metals), the Discharger is responsible for collecting sufficient intra-well background data such that statistical analysis of non-anthropogenic COCs can be performed.

Comment: *Suggested replacement.*

Page 5, Fourth Paragraph:

Method detection limits and practical quantitation limits shall be reported. All peaks shall be reported, including those which cannot be quantified ~~and/or specifically identified~~. Metals shall be analyzed in accordance with the methods listed in Table VI.

Comment: *Suggested removal.*

Page 6, Second Table:

Landfill Groundwater Piezometers

Fill Area	Well No.
1	B-8, E-18, E-21, E-22, MW-1A, MW-1B, MW-2B, MW-2C, MW-3B, MW-3C, MW-4B, MW-5B, WM-1, P-5G
2	B-8 , MW-3B, MW-3C, MW-4B, WM-1, WM-2, ARC-2, HSA-6, P-1 , P-2, PC-1A, PC-1B, PC-1C, PC-2A, PC-2C, PC-6A , PC-6B

Comment: *It is recommended that the piezometers be removed because they are redundant, typically dry, very far removed from landfill footprint, or decommissioned.*

Page 7, Third Paragraph:

Table II presents the list of analytes and mediums to be sampled (liquid ~~and soil pore gas~~).

Comment: *Suggested removal because unsaturated zone monitoring program described includes only liquid samples.*

Page 7, Fourth Paragraph:

Upon detection of water in a previously dry lysimeter or subdrain, the Discharger shall immediately sample the water ~~and soil pore gas~~ and shall continue to sample the lysimeter as described in Table II.

Comment: *Suggested removal because unsaturated zone monitoring program described includes only liquid samples.*

Page 9, First Paragraph:

~~The Discharger shall comply with the requirements of the Industrial Activities Stormwater General Permit. Surface water flows from on and around the landfill shall be sampled at the point(s) where they leave the facility boundary. Samples shall be taken twice during the wet season (October 1 to May 30) starting with the first storm of the rainy season which produces significant flows and analyzed for parameters listed in Table IV. Samples shall also be collected from each stormwater retention basin annually and shall be analyzed for the parameters listed in Table IV. [remove]~~

Comment: *It is recommended that all text following the first sentence be removed. The facility has a separate permit (WDID #55011000600) issued from SWRCB regulating storm water sampling. Inclusion of storm water sampling requirements in the MRP represents a redundant and dual permitting obligation.*

Page 16, Item 5(b):

~~b) — Hydrographs of each well showing the elevation of groundwater with respect to the elevations of the top and bottom of the screened interval and the elevation of the pump intake.~~

Comment: *It is recommended that this reporting requirement be removed for the following reasons: (1) there is no requirement in Title 27 to provide such information; (2) this work will require individual figures for each well and is*

labor intensive; (3) the information will be generally consistent from event to event, and will provide very limited (if any) value as part of routine monitoring. Presentation of such data has value if significant water quality changes are observed and more detailed analysis is required, but this added work is considered an unnecessary expense as part of routine groundwater reporting.

Table I:

GROUNDWATER MONITORING PROGRAM PARAMETERS

<u>Parameter</u>	<u>Units</u>	<u>Frequency</u>
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Volatile Organic Compounds (USEPA Method 8260B, See Table V)		
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Comment: Table V includes Appendix I VOCs and the extra VOCs added to the list in the current MRP (tetrahydrofuran, diethyl ether, dichlorofluoromethane, dichlorodifluoromethane, and trichlorofluoromethane). The 2009 Tentative MRP also proposes to include additional fuel oxygenates such as tert butyl alcohol, ethanol, methyl tert butyl ether, etc. Waste Management would like to request the removal of the additional fuel oxygenates from the detection monitoring program VOC list (Table V) so that the list is consistent with the current program (based on the 2002 MRP) and because the additional VOC compounds will not increase the sensitivity of the monitoring program in regard to identifying impacts from the landfill to groundwater. Please note that the fuel oxygenates have been included in recent 5-Year COC monitoring events and, based on the proposed 2009 MRP will remain on the 5-Year COC list.

Table II:

PAN LYSIMETERS (or other vadose zone monitoring device)

<u>Parameter</u>	<u>Units</u>	<u>Frequency</u>
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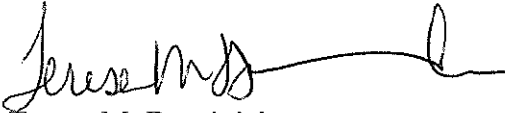
Field Parameters

Electrical Conductivity	µmhos/cm	Semiannual Quarterly
pH	pH units	Semiannual Quarterly

Comment: To be consistent with the text on Page 7, recommend that frequency of field parameter testing be changed from semi-annual to quarterly, and that frequency of monitoring parameters be changed from semi-annual to annual.

WM appreciates the opportunity to provide these proposed modifications to the tentative WDRs, and we look forward to working with you on this project. If you have any questions concerning these comments, please contact Teresa Dominick at (925) 525-3488, or Jim Obereinier at (916) 294-4162.

Sincerely,
Waste Management, Inc.

A handwritten signature in black ink, appearing to read 'Teresa M. Dominick', with a long horizontal flourish extending to the right.

Teresa M. Dominick
Environmental Protection Manager

Cc: Ken Lewis
Jim Obereinier
Guy Petraborng
Tianna Nouroto